

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

EPSILON ENERGY USA,  
INC.,

Plaintiff,

v.

CHESAPEAKE APPALACHIA, LLC,

Defendant.

Civil Action No. 1:21-CV-658

**FILED**  
HARRISBURG, PA

JUN - 4 2021

PER TSR  
DEPUTY CLERK

**UNOPPOSED MOTION FOR LEAVE TO FILE PORTIONS OF  
AMENDED COMPLAINT AND EXHIBIT UNDER SEAL**

Plaintiff Epsilon Energy USA, Inc. (“Epsilon”), by and through its undersigned counsel, respectfully moves this Court for leave to file portions of its Amended Complaint and an exhibit attached thereto, the Settlement Agreement, under seal. The Amended Complaint is attached as Exhibit A to Epsilon’s Motion for Leave to File an Amended Complaint. In support of this motion, Epsilon refers the Court to its Memorandum in Support filed contemporaneously herewith. Epsilon conferred with counsel for Chesapeake Appalachia, LLC (“CHK”) and CHK consents to this Motion.

WHEREFORE, for the reasons stated in the accompanying Memorandum in Support of Motion for Leave to File Portions of the Amended Complaint and Exhibit Under Seal, Epsilon respectfully requests this Court enter an Order granting it leave

to file certain portions of its Amended Complaint and an exhibit, the Settlement Agreement, under seal.

Dated: June 1, 2021

Respectfully submitted,

/s/ Gregory J. Krock

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*Counsel for Plaintiff  
Epsilon Energy USA, Inc.*

**LOCAL RULE 7.1(a)(1)(A) MEET AND CONFER STATEMENT**

I, Gregory J. Krock, representing Epsilon Energy USA, Inc. (“Epsilon”) hereby certifies that pursuant to Local Rule 7.1(a)(1)(A), counsel for Epsilon has conferred with counsel representing Defendant Chesapeake Appalachia, L.L.C. (“CHK”) regarding the subject of the present Motion for Leave to file Portions of Amended Complaint and Exhibit Under Seal. CHK consents to the Motion.

Dated: June 1, 2021

Respectfully submitted,

/s/ Gregory J. Krock  
Gregory J. Krock

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing  
**Motion for Leave to File Portions of the Amended Complaint and an Exhibit  
Under Seal** has been served upon counsel of record via ECF filing system, this 1<sup>st</sup>  
day of June 2021:

/s/ Gregory J. Krock